

**Commonwealth of Kentucky  
Division for Air Quality**

***RESPONSE TO COMMENTS***

ON THE CONDITIONAL MAJOR DRAFT PERMIT NO. F-07-029

OWENSBORO SPECIALTY POLYMERS, LLC

5529 US HWY 60 EAST, OWENSBORO, KY 42303

AUGUST 18, 2007

JULIAN BRECKENRIDGE, REVIEWER

SOURCE I.D. #: 021-059-00155

SOURCE A.I. #: 972

ACTIVITY #: APE20060003

**SOURCE DESCRIPTION:**

Owensboro Specialty Polymers, LLC (OSP) owns and operates a batch chemical manufacturing facility in Owensboro, Kentucky. Originally built by the Dewey and Almy Chemical Division of W.R. Grace in 1958, OSP purchased the facility from W.R. Grace & Co. in September 2005. The primary products of OSP are various latex polymers, which fall under the Standard Industrial Classification (SIC) Code 2821 – Plastics Materials and Resins. There are four process groups at the facility: (1) reactor trains, (2) raw material storage tanks, (3) product storage tanks with ancillary piping, and (4) wastewater treatment facilities. Each affected facility/emission point that comprises these process groups have been grouped together for the purposes of presenting the requisite information on emissions and applicable requirements in this application. Generally, the four remaining product lines that draw raw materials from the raw material storage tanks are polymerized in the reactor trains, and the product is then transferred to the product storage tanks to await shipment.

**PUBLIC AND U.S. EPA REVIEW:**

On July 18, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Messenger-Inquirer* in Owensboro, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Owensboro Specialty Polymers, LLC of Owensboro, Kentucky on July 31, 2007. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

**CREDIBLE EVIDENCE:**

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.

# ATTACHMENT A

## Response to Comments

Comments on Owensboro Specialty Polymers Draft Conditional Major Air Quality Permit submitted by Scott A. Melliore of Owensboro Specialty Polymers, LLC.

Only two comments were received and are displayed accordingly with the Division's response following those comments (See Attachment B for the copy of the Comments on Draft Conditional Major):

### COMMENTS

- 1) Please find enclosed corrected Form N (DEP7007N) pages 8, 12, and 17, associated with our Conditional Major Permit Application. The reason for our correction submittal is due to a clerical error when we submitted new Form N pages as response to a Notice of Deficiency (NOD) from your department. The correction relates just one (1) hazardous constituent, Acrylonitrile, as it appears in two (2) KyEIS emission points, and consequently the Plant-Wide emission total. The corrected potential-to-emit VOC total does not exceed 90 tons/year, which is our limit in the draft Conditional Major Permit.

*Division's Response: The Division has applied those corrections and updated the Kentucky Emissions Inventory System and has changed the emission summary table of the Permit Application Form to read as follow:*

Pollutant	Actual (tpy)	Potential (tpy)
VOC	11.9	80.6
<b>SINGLE HAPs</b>		
Acrylonitrile	0.9	2.153
Acrylic Acid	0.02	0.177
Methanol	0.6	< 9.5
Methyl Methacrylate	0.7	8.155
Vinyl Acetate	1.8	< 9.5
Vinylidene Chloride	5.1	< 9.5
<b>Combine HAPs</b>	<b>9.12</b>	<b>&lt; 23.75</b>

- 2) I have also enclosed the applicable pages of ATTACHMENT B – PERMIT STATEMENT OF BASIS, for which I have edited in red ink, illustrating the changes we request in the Final Draft/Issuance of the Conditional Major Permit, to accurately reflect the information appearing on those pages. The changes are deletions of a Product, and associated raw materials, that are no longer made at this facility and which did not appear in our Conditional Major Application.

*Division's response: Comment acknowledged; the Division has made the requested changes to the Statement of Basis on page 2 of 6 to read as follow:*

*SPECIALTY (R-1117) is a cationic acrylic polymer emulsion used as a primer or coating for labels and other film applications. Regulation 401 KAR 63:020, Potentially hazardous matter or toxic substances, applies because of discharge of Acrylonitrile. SPECIALTY is normally produced in two reactor trains (Reactor 650 and 450 with associated equipment).*

## **ATTACHMENT B**

**(Copy of the Comments of the Draft Conditional Major Permit)**

# **ATTACHMENT C**

**(Revised Application Summary Form)**

# **ATTACHMENT D**

**(Revised Statement of Basis)**